

LODGED
CLERK, U.S. DISTRICT COURT
2/26/2025
CENTRAL DISTRICT OF CALIFORNIA
BY: _____ ASI _____ DEPUTY

UNITED STATES DISTRICT COURT

for the

Central District of California

FILED
CLERK, U.S. DISTRICT COURT
February 26, 2025
CENTRAL DISTRICT OF CALIFORNIA
BY: _____ CLD _____ DEPUTY

United States of America

v.

Mariel LINO,

Defendant

Case No. 2:25-mj-00996-DUTY

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 2, 2023, August 17, 2023, and April 5, 2024, in the county of Los Angeles in the Central District of California, the defendant(s) violated:

Code Section

21 U.S.C. § 841(a)(1)

Offense Description

Possession with the Intent to
Distribute a Controlled Substance

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

/s/ Tyler Abrego, Special Agent

Complainant's signature

Tyler Abrego, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: February 26, 2025

City and state: Los Angeles, California

Jacqueline Chooljian
Judge's signature

Hon. Jacqueline Chooljian, U.S. Magistrate Judge

Printed name and title

AUSA: Diane Roldán (x6567)

AFFIDAVIT

I, Tyler Abrego, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against Mariel LINO ("LINO"), charging her with violating 21 U.S.C. § 841(a)(1) (Possession with the Intent to Distribute a Controlled Substance).

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show that there is sufficient probable cause for the requested complaint and warrant and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. BACKGROUND OF AFFIANT

3. I am a Special Agent with the United States Drug Enforcement Administration ("DEA") and have worked for DEA since May 2023. I am currently assigned to Enforcement Group 2 in DEA's Los Angeles Field Division. Enforcement Group 2 investigates narcotics trafficking and money laundering violations under Titles 18 and 21 of the United States Code. Enforcement Group 2 is comprised of special agents from DEA and local law enforcement personnel designated as Task Force Officers.

4. In the course of my employment with DEA, I have participated in many aspects of narcotics investigations, including conducting physical surveillance, executing search warrants, directing confidential informants, and conducting arrests. Based on my training and experience, I am familiar with narcotics traffickers' methods of operation, including the distribution, storage, and transportation of narcotics and the collection and laundering of drug trafficking proceeds. I am also familiar with methods employed by drug traffickers and large-scale drug trafficking organizations to impede detection by law enforcement, including the use of coded language, counter-surveillance, multiple vehicles, prepaid or debit calling cards, cellular telephone technology, false or fictitious identities, and encoded communications.

III. SUMMARY OF PROBABLE CAUSE

5. Law enforcement officers have observed LINO possess controlled substances on at least three occasions since 2023.

6. **First**, on June 2, 2023, LINO sold approximately 9,466 fentanyl pills with a combined net weight of approximately 1,026 grams and 2.4% purity, resulting in about 24 grams of fentanyl, to a DEA confidential source. LINO sold the pills in exchange for \$10,000, based on terms she and other co-conspirators had pre-negotiated on recorded calls and text messages.

7. **Second**, on August 17, 2023, law enforcement officers watched as LINO transferred two red fire extinguishers and one brown bag from her Ford Explorer to a co-conspirator's Jeep. A short time later, officers conducted a traffic stop of the co-

conspirator's Jeep. Inside the Jeep, officers found the two red fire extinguishers and one brown bag. The fire extinguishers had been hollowed out and each contained fentanyl and methamphetamine. The brown bag contained fentanyl powder.

8. **Third**, on April 5, 2024, law enforcement officers executed a federal warrant at LINO's residence. In the garage and kitchen of LINO's home, officers found plastic-wrapped bundles containing a total of approximately 14.5 kilograms of actual methamphetamine.

IV. STATEMENT OF PROBABLE CAUSE

9. Based on my training and experience, my personal involvement in this investigation, conversations with other law enforcement officers, and review of reports and other documents prepared by law enforcement officers, I am aware of the following:

A. On June 2, 2023, LINO Sells About 10,000 Fentanyl Pills to a DEA Confidential Source for \$10,000

1. Drug Traffickers Offer to Sell a DEA Confidential Source 10,000 Fentanyl Pills for \$10,000

10. In May 2023, the DEA received a lead regarding a fentanyl source of supply from Culiacan, Sinaloa, Mexico referred to as "Mateo." A confidential source working for the DEA ("CS-1")¹ then identified Mateo to the DEA. According to CS-

¹ CS-1 has been a CS since 2003. CS-1 was arrested by the DEA in 2000 and charged with violations of 18 U.S.C. § 1956 and 21 U.S.C. §§ 841 and 846. CS-1 pled guilty and served five years in prison. Currently, CS-1 has no pending charges, is not on probation or parole, and is working for monetary compensation. Since activation CS-1 has participated in numerous successful investigations, which have resulted in the
(footnote cont'd on next page)

1, Mateo was affiliated with the "Chapitos" and had access to drug labs in Mexico. The Chapitos are a drug trafficking organization specializing in the manufacturing and trafficking of fentanyl and are affiliated with the Sinaloa Cartel.

11. CS-1 informed the DEA that CS-1 did not have direct contact with Mateo. Instead, CS-1 would contact an individual CS-1 knew as "Luis", who would then communicate with Mateo on CS-1's behalf. In May 2023, CS-1 reported that, through Luis, CS-1 had learned that Mateo had approximately 10,000 fentanyl pills in Los Angeles available for sale for \$10,000.

12. On May 29, 2023, DEA gave CS-1 the telephone number for an undercover DEA agent ("UC-1") for the purpose of facilitating a controlled purchase of 10,000 fentanyl pills from Mateo. CS-1 then passed UC-1's telephone number and undercover name to Luis with the request to buy 10,000 fentanyl pills.

13. On the morning of May 30, 2023, CS-1 contacted Luis to ask if UC-1's telephone number had been passed to Mateo. Luis told CS-1 that Mateo had received the phone number and said that Mateo had passed it to his associate in Los Angeles. Luis also told CS-1 that Mateo's associate in Los Angeles would contact UC-1 to coordinate a drug transaction, during which UC-1 would purchase 10,000 fentanyl pills from Mateo's associate in Los Angeles.

arrest of several high value DEA targets. Where possible, information provided by CS-1 has been corroborated and proven reliable. CS-1 is currently a legal permanent resident of the United States.

2. LINO Contacts an Undercover Law Enforcement Agent to Arrange the Drug Deal

14. On May 31, 2023, at approximately 5:35 p.m., UC-1 received a call from a woman using a telephone number ending in 2518. According to AT&T subscriber data, the telephone number was subscribed to LINO with a billing address of 20519 Kenwood Avenue in Torrance, California ("LINO's Kenwood Avenue Home"). Law enforcement databases showed that this address was also associated with LINO. LINO's call to UC-1 was conducted in Spanish and was audio-recorded by DEA.

15. On the call on May 31, 2023, LINO said that she was calling for UC-1. LINO used UC-1's undercover name, which CS-1 had provided to Luis. In response, UC-1 confirmed that s/he was the person LINO was seeking. UC-1 then said that s/he had been waiting since 2:00 p.m. for the "mercancias" (Spanish for merchandise). Based on my training, experience, and conversations with members of the DEA investigative team, I understand the term "mercancias" to be coded language for drugs.

16. UC-1 asked LINO if she could drop off the "mercancias" in Commerce, California. LINO said she could not because she was three hours away, but that she would be able to drive to Commerce the next day (June 1, 2023). UC-1 informed her that s/he would call her back with a decision.

17. Later on May 31, 2023, on a recorded call, UC-1 called back LINO and told her that he was unable to proceed with the purchase the next day (June 1, 2023), but he was able to meet on

June 2, 2023. LINO agreed to meet UC-1 at 11:00 a.m., on June 2, 2023, at a specified bakery in Torrance, California.

18. On June 1, 2023, UC-1 and LINO had a conversation in Spanish via text message. In that text exchange, UC-1 informed LINO that his/her associate would contact LINO the following day, June 2, 2023, to complete the drug transaction.

Unbeknownst to LINO, UC-1's associate was a second confidential source working for the DEA ("CS-2").²

19. Based on my training and experience, the timing of LINO's first call to UC-1, LINO's use of UC-1's undercover name, and LINO's agreement to sell drugs to UC-1, I believe that LINO was associated with Mateo's drug trafficking organization.

3. On June 2, 2023, LINO Sells 10,000 Fentanyl Pills to a DEA Confidential Source for \$10,000

20. At about 10:41 a.m., on June 2, 2023, Beverly Hills Police Department ("BHPD") established surveillance near the pre-arranged meeting location for the drug transaction, which was a bakery in Torrance, California. According to BHPD, officers saw LINO's 2004 white Ford Explorer³ parked on the curb near the bakery.

² CS-2 was established as a DEA confidential source in 2021. CS-2 is a cooperating defendant who is facing charges from a separate and unrelated DEA investigation. CS-2's criminal history includes prior convictions for misdemeanor inflicting corporal injury on a spouse/cohabitant in 2000, and felony conspiracy to distribute narcotics in 2021. CS-2 is currently in good standing with the DEA and has proven to be reliable.

³ Between May 31, 2023, and June 1, 2023, DEA searched law enforcement databases and learned that LINO was the registered owner of a 2004 white Ford Explorer, bearing California License Plate 8YEL730. On June 1, 2023, at approximately 6:18 p.m., DEA
(footnote cont'd on next page)

21. Culver City Police Department ("CCPD") also established surveillance near the bakery in Torrance. According to CCPD, they observed an unidentified man ("UM-1") walk up to LINO's white Ford Explorer and get in. UM-1 then drove the white Ford Explorer and parked it behind the Torrance bakery. UM-1 got out of the white Ford Explorer and entered the bakery.

22. A short time later, CS-2 arrived at the bakery and texted LINO to let her know s/he had arrived. In English, LINO asked CS-2 to come to the rear of bakery. CS-2 then drove to the bakery's rear parking lot and parked. According to CCPD, officers saw LINO exit the bakery carrying a gray plastic bag. She walked to the front passenger window of CS-2's car and placed the gray plastic bag inside the car. In exchange, CS-2 handed LINO \$10,000. CCPD officers then observed LINO walk away from CS-2's car and CS-2 drove away. CS-2 was wearing a hidden camera, which recorded LINO giving CS-2 the bag, as depicted below:

agents conducted surveillance at LINO's Kenwood Avenue Home and saw the white Ford Explorer parked in the driveway. BHPD saw this same white Ford Explorer near the bakery in Torrance on June 2, 2023.



23. According to CCPD, officers next watched LINO walk to her white Ford Explorer, open the back hatch, and place an object inside the white Ford Explorer. LINO then went back inside the bakery.⁴

24. After the transaction, CS-2 returned to a pre-arranged meeting location with law enforcement. CS-2 gave officers the gray plastic bag CS-2 had received from LINO. Inside the plastic bag was another plastic bag containing a large number of counterfeit blue "M30" pills, designed to mimic the appearance of prescription Oxycodone, as depicted in the photograph below:

⁴ A few hours after the drug transaction between LINO and CS-2, CCPD and BHPD officers saw LINO exit the bakery. LINO got into the white Ford Explorer, made two stops, and then drove back to LINO's Kenwood Avenue Home.



25. Law enforcement then sent the blue pills to DEA's Southwest Laboratory for testing. On June 23, 2023, the laboratory completed its analysis of the blue pills. The laboratory found that the bag contained approximately 9,466 fentanyl pills with a combined net weight of 1,026 grams and approximately 2.4% purity, resulting in about 24 grams of fentanyl.

B. On August 17, 2023, LINO Possessed Fentanyl and Methamphetamine in Two Red Fire Extinguishers and One Brown Bag

1. Law Enforcement Tracks LINO's White Ford Explorer from Her Home to a Target Parking Lot

26. On June 12, 2023, the Honorable Karen L. Stevenson, United States Magistrate Judge, authorized a federal warrant to install a GPS tracking device on LINO's white Ford Explorer.

See Case No. 2:23-mj-02989.⁵ DEA agents installed the GPS tracker on June 14, 2023.

27. On August 17, 2023, at approximately 4:30 p.m., Orange County Sheriff's Department ("OCSD"), working in conjunction with DEA agents, established surveillance near LINO's Kenwood Avenue Home. Shortly thereafter, an OCSD investigator saw LINO drive her white Ford Explorer, with the GPS tracking device, from her driveway to the parking lot of a Target store located in Diamond Bar, California. LINO's white Ford Explorer parked in a parking stall far from the Target entrance and away from other cars.

2. A Co-Conspirator Takes Two Red Fire Extinguishers and One Brown Plastic Bag from LINO's Ford and Places Them in a Jeep.

28. According to OCSD, at around 6:05 p.m., a gray Jeep Liberty drove up and parked on the passenger side directly next to LINO's Ford Explorer. The Jeep was registered to Juan Ayala. A Hispanic male, later identified as Bryant Alberto Gonzalez ("Gonzalez"), then exited the Jeep Liberty and entered the passenger seat of LINO's Ford Explorer.

29. A couple of minutes later, LINO and Gonzalez got out of the white Ford Explorer and walked towards the back of the car. Gonzalez opened the rear passenger door and removed two

⁵ Warrant extensions were subsequently granted on July 25, 2023, by United States Magistrate Judge Karen L. Stevenson; on September 8, 2023, by United States Magistrate Judge Maria A. Audero; on November 29, 2023, by United States Magistrate Judge Brianna Fuller Mircheff; and on January 10, 2024, by United States Magistrate Judge Stephanie Christensen.

red fire extinguishers and one weighted brown plastic bag from LINO's white Ford Explorer.

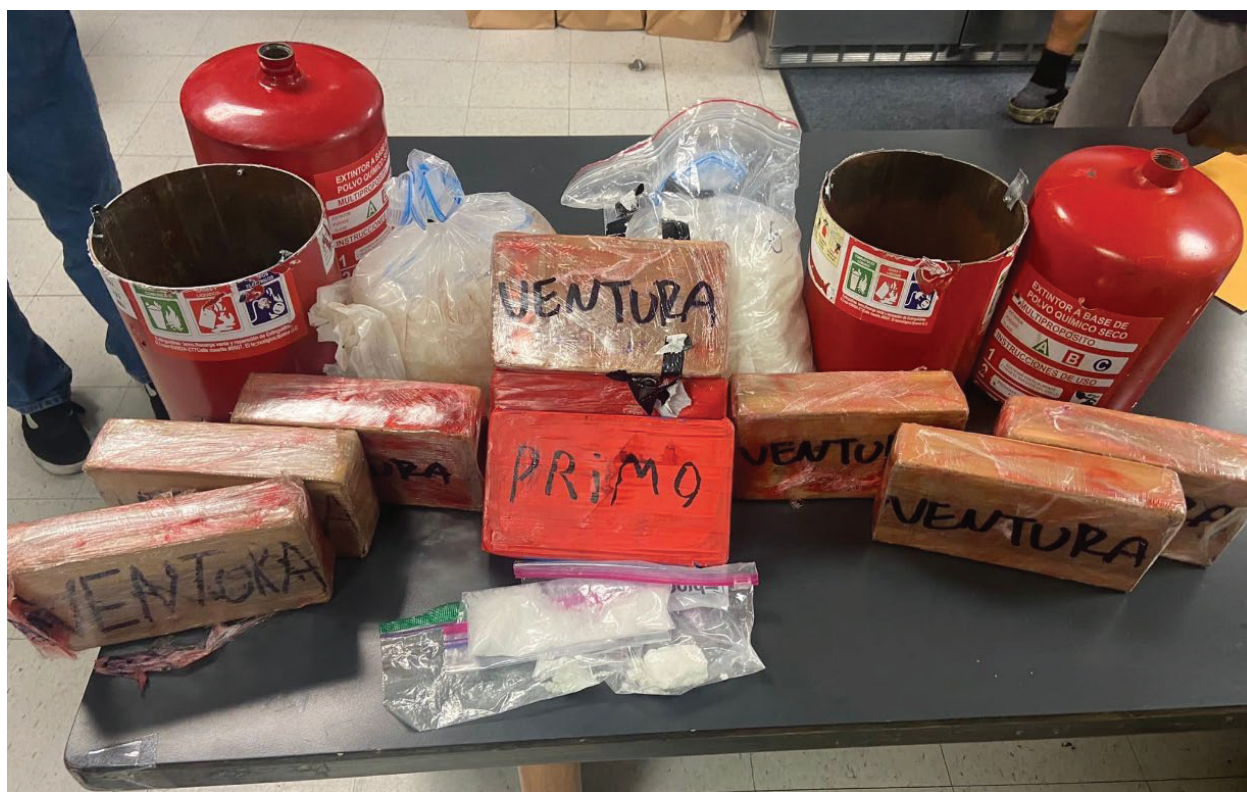
30. OCSD officers then watched Gonzalez place the two red fire extinguishers into the rear seat of the Jeep Liberty. He then placed the brown plastic bag in the Jeep's front seat. Both LINO and Gonzalez then re-entered their respective cars and immediately drove away.

3. Officers Traffic Stop the Jeep and Find the Two Red Fire Extinguishers and One Brown Bag, Which All Contained Drugs.

31. According to OCSD, a short time later OCSD officers conducted a traffic stop of the Jeep Liberty near 23080 Paseo De Terrado in Diamond Bar, California. During the traffic stop, law enforcement identified Gonzalez as the driver of the car and Ayala (the Jeep's registered owner) as one of the passengers, based on their California driver's licenses. An officer asked Gonzalez if there was anything illegal inside the Jeep Liberty, to which Gonzalez replied "honestly, yes." Gonzalez then said that there was an unknown amount of drugs inside a box.

32. OCSD officers searched the Jeep Liberty and found two fire extinguishers in the rear of the car. The fire extinguishers had been hollowed out, and inside each were three bricks of suspected fentanyl and one bag of methamphetamine. The suspected fentanyl bricks were wrapped with clear plastic and weighed a total of approximately six kilograms, including packaging. Four bricks were labeled "VENTURA" and two bricks were labeled "PRIMO." The two methamphetamine bags weighed approximately 12 pounds total, including packaging.

33. In addition, OCSD officers found a brown bag on the passenger seat floorboard. According to their report, the brown bag contained approximately one kilogram of suspected fentanyl powder. Below is a photograph of the fire extinguishers, suspected fentanyl, and suspected methamphetamine as depicted in law enforcement custody:



34. Law enforcement officials also located a trap compartment under the front passenger seat, where Ayala was seated. The trap compartment contained approximately two kilograms of suspected fentanyl powder. It also contained three

zip-top baggies, one containing suspected methamphetamine and two containing suspected cocaine.⁶

35. OCSD officers seized the drugs from the fire extinguishers, brown bag, and trap compartment and brought them back to OCSD's office. On September 8, 2023, OSCD transferred custody of the suspected drugs to DEA, which shipped the drugs to DEA's Southwest Laboratory for testing that same day.

4. The Two Red Fire Extinguishers and One Brown Bag Contained Fentanyl and Methamphetamine.

36. When DEA shipped the drugs to its laboratory, agents booked the three bags of methamphetamine (two larger bags from the two fire extinguishers and one smaller bag from the trap compartment) as one exhibit (Exhibit 3). DEA booked the nine fentanyl bricks (six bricks from the two fire extinguishers, one brick from the brown plastic bag, and two bricks from the car compartment) as one exhibit (Exhibit 2).

37. On September 27, 2023, the DEA Southwest Laboratory completed its analysis of the suspected fentanyl and methamphetamine. The three bags of suspected methamphetamine had a total net weight of approximately 5,402 grams (about 11.9 pounds) and a purity of approximately 99%, resulting in about

⁶ On March 27, 2024, the Honorable Charles F. Eick, United States Magistrate Judge, issued a warrant to search LINO's home. In the DEA affidavit supporting the application for this warrant, one of the headings read: "... LINO Provides Individuals with 9 Kilograms of Fentanyl Powder and 12 Pounds of Methamphetamine" (emphasis added). In total, the Jeep contained about nine kilograms of fentanyl powder (including packaging weight). However, about two of those kilograms were from bricks found in the Jeep's trap compartment. The fire extinguishers and brown plastic bag contained a total of about seven kilograms of powder (gross weight). These weights were further and accurately explained and described in the text of the affidavit.

5,347 grams of actual methamphetamine. The nine bricks of suspected fentanyl had a total net weight of approximately 8,946 grams (about 19.7 pounds) and a purity of approximately 62%, resulting in about 5,546 grams of pure fentanyl.

C. On April 5, 2024, LINO Possessed Approximately 32 Pounds of Methamphetamine at Her Home.

1. Law Enforcement Officers Executed a Federal Search Warrant at LINO's Home.

38. On March 27, 2024, the Honorable Charles F. Eick, United States Magistrate Judge, authorized a warrant to search LINO's residence (the "Federal Warrant"). See Case No. 2:24-MJ-01767. On April 5, 2024, law enforcement personnel executed the Federal Warrant at LINO's Kenwood Avenue Home. I participated in the Federal Warrant execution.

39. Agents entered LINO's Kenwood Avenue Home at around 3:30 a.m., on April 5, 2024. At the time, LINO was present at home with her son, daughter, and sister. Evidence found within the residence confirmed it was LINO's residence, including mail addressed to LINO, including tax documents and earnings statements, multiple receipts referencing LINO's name, and LINO's Mexican birth certificate.

40. Inside the garage of LINO's Kenwood Avenue Home, law enforcement officers found a cardboard box and a plastic storage bin on a shelf. Inside the box and bin were about 32 plastic-wrapped items resembling burritos, depicted in the photograph below, each containing suspected methamphetamine:



41. In the kitchen, inside a laundry basket, law enforcement officers found a plastic-wrapped item containing suspected methamphetamine. DEA seized the items and sent them to the DEA Southwest Laboratory for testing.

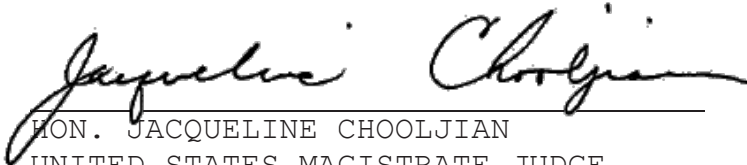
2. The Plastic-Wrapped Bundles Found in LINO's Kenwood Avenue Home Contained Methamphetamine

42. On April 26, 2024, the DEA Southwest Laboratory completed its testing. The laboratory reported that the 32 plastic-wrapped bundles of suspected methamphetamine from LINO's garage had a net weight of 13.7 kilograms and a purity of approximately 100%, resulting in about 13.7 kilograms of actual methamphetamine. The suspected methamphetamine from LINO's kitchen had a total net weight of 812 grams and a purity of approximately 99%, resulting in about 803.8 grams (0.8 kilograms) of actual methamphetamine.

V. CONCLUSION

43. For all the reasons described above, there is probable cause to believe that LINO committed violations of Title 21, United States Code, § 841(a)(1) (Possession with the Intent to Distribute a Controlled Substance).

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 26th day of
February 2025.



HON. JACQUELINE CHOOLJIAN
UNITED STATES MAGISTRATE JUDGE